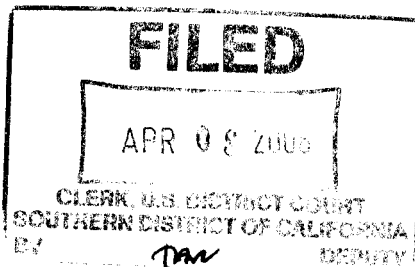


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AUSA



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8307

UNITED STATES OF AMERICA,

Plaintiff,

v.

Ramon Guadalupe SOBERANES-Fierro,

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

That on or about April 7, 2008, within the Southern District of California, defendant Ramon Guadalupe SOBERANES-Fierro did knowingly and intentionally import approximately 18.26 kilograms (40.17 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Lonnie Brasby, Special Agent  
U.S. Immigration & Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 8TH  
DAY OF APRIL 2008.

PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Ramon Guadalupe SOBERANES-Fierro

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes  
6 furnished to U. S. Immigration and Customs Enforcement Special Agent Lonnie Brasby.

7 On April 7, 2008, at approximately 1339 hours, Ramon Guadalupe  
8 SOBERANES-Fierro entered the United States at the Calexico, CA, West Port of Entry.  
9 SOBERANES-Fierro was the driver of a 2004 Nissan X-Trail.

10 At primary inspection, SOBERANES-Fierro gave a negative Customs declaration  
11 to Customs and Border Protection Primary Officer (CBPO) C. Carrillo. SOBERANES-  
12 Fierro's hand was trembling when he handed CBPO C. Carrillo his Border Crossing  
13 Card (BCC). During questioning, SOBERANES-Fierro advised CBPO C. Carrillo that he  
14 was on his way to buy tennis shoes. CBPO C. Carrillo referred SOBERANES-Fierro to  
15 secondary for a more intensive inspection.

16 In the vehicle secondary lot, Canine Enforcement Officer A. Gonzalez utilized his  
17 Narcotic Detector Dog, who alerted to the dashboard area of the vehicle. A subsequent  
18 inspection of the vehicle revealed seventeen (17) packages, which were discovered in a  
19 compartment located within the engine firewall area of the vehicle. One of the packages  
20 was probed and a sample of a white powdery substance was obtained, which field  
21 tested positive for cocaine. The 17 packages had a combined net weight of  
22 approximately 18.26 kilograms (40.17 pounds) of cocaine.

23 SOBERANES-Fierro was arrested for importation of cocaine into the United  
24 States. SOBERANES-Fierro was advised of his rights, per Miranda. SOBERANES-  
25 Fierro stated that he understood his rights and was willing to answer questions without  
26 the presence of an attorney. SOBERANES-Fierro admitted knowledge of the narcotics  
27 concealed in the vehicle and was to be paid \$500.00 for the smuggling venture.  
28  
29